

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY LANSING



January 24, 2003

Mr. Douglas Cowin Blasland, Bouck & Lee, Inc. 200 South Wacker Drive, Suite 3100 Chicago, Illinois 60606

EPA Region 5 Records Ctr.

Dear Mr. Cowin:

SUBJECT: Review of Work Plan for Additional Remedial Investigation (RI) Studies

The Michigan Department of Environmental Quality (MDEQ), Remediation and Redevelopment Division has reviewed the Blasland, Bouck & Lee, Inc.'s (BBL) document entitled Work Plan for Additional RI Studies dated December 27, 2002. The purpose of the work plan as stated in the first paragraph of the document is to identify additional work elements that are necessary to complete the RI for the site. The following comments are offered for clarification purposes.

- Monitor wells in the area of the Type III Landfill will be constructed of polyvinyl
 chloride material while monitor wells completed along the Monarch historic
 residuals dewatering lagoon (HRDL) will be constructed of Stainless Steel well
 materials.
- Monitor wells constructed along the Monarch HRDL will first be attempted at the base of the berm utilizing a tripod rig.
- BBL indicated it would prefer that monitor wells completed within the floodplain adjacent to the Type III Landfill have their screens completed entirely within the native material below the United States Environmental Protection Agency (U.S. EPA) fill. The MDEQ indicated a preference for nested wells in this area (screens in both the native material and the U.S. EPA fill material) if two flow regimes exist in the two different materials as characterized during our January 15, 2003 conference call. It is understood that this issue will be resolved prior to completion of the scope of work. It is also anticipated that monitor wells completed at the edge of the Monarch HRDL will have screens located in the native material just below berm material with final well screen placement dependent upon identified field conditions.
- Sediment sampling to be conducted north of the former Western Disposal area will include low areas adjacent to the berm and potentially out into the swamp based on field observations. Sampling will not be limited to the slope of the berm.

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> Placement of soil samples in the former raceway channel and adjacent to the Monarch HRDL will be based on field observations

If you have any questions regarding this letter, please feel free to contact me.

Sincerely

Paul Bucholtz

Environmental Quality Analyst

Superfund Section

Remediation and Redevelopment Division

517-373-8174

cc: Ms. Bonnie A. Barnett, Esq., Drinker Biddle & Reath, LLP

Ms. Joyce Schlesinger, Environ

Ms. Daria W. Devantier, MDEQ/file

Mr. John Bradley, MDEQ

Mr. Brian von Gunten, MDEQ